

Allergen Control: A Triple-Check Approach

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Undeclared allergens account for the majority of food recalls in the United States. Controlling allergens is often easier than controlling pathogens, since ingredients are usually added intentionally and can often be seen. This seemingly obvious distinction gives you an advantage in developing common sense systems to verify your labeling is correct and that you do not introduce undeclared allergens.

First, it is paramount that all staff members understand the importance of strict allergen control. It can't be just the Supervisors and Managers that monitor allergen control. This is done through education and repetitive training. Furthermore, with about 6 percent of the U.S. population having food allergies, many people know of a family member or friends that are allergic. This personal connection helps reinforce the severity of allergen control.

Allergen control starts with the initial formula and ingredient declaration. This should be vetted by qualified Quality Control personnel and double-checked by experienced Production personnel. The use of a third-party expert is recommended if you are setting up internal controls for the first time. While this initial step of ingredient declaration is vital, most allergen failures come from applying the wrong label to a product or unintentionally introducing allergens to a product by mistake or due to improper cleaning between products.

For all size containers, you need to verify the correct ingredients are used in the formula. We recommend a triple-check verification and sign-off. First, the ingredients are pulled and staged by Warehouse and Production staff members. Both the Warehouse staff member and Production staff member should initial the production sheet and enter the lot numbers of the ingredients. Next, the Production lead should scan/record all the ingredients going into the batch and initial the production sheet. The Production lead should also visually review open boxes of all ingredients to verify nothing looks out of the ordinary or has been mislabeled when repackaged. Some ingredients look similar. For example, a chocolate-covered peanut butter cup may look just like a chocolate-covered raspberry cup. Finally, the Production Manager and Quality Control Director should verify that the ingredients pulled match the formula and label.

Most packaging for ice cream is pre-printed on the carton, cup, or wrapper. This ensures the label is correct and the declared allergens are correct, as long as the correct ingredients are used. If you print labels, as commonly done for bulk containers, you must have procedures in place to verify the correct label is printed and applied. Again, we recommend a triple-check process. First, the Production Manager determines the flavor(s) count to be made. A dedicated team member that is familiar with label printing will either print a label with code dates or retrieve pre-printed label stock if a separate lot code applicator is used for the container. The key is to make sure the proper label/lot code is applied to the container. The lead Production team member should then verify that the initial and final label are correctly applied to the container, and also verify that the total count of containers filled matches the number of labels printed or pulled from the pre-printed label stock. A final verification of the total counts should be done by the Production Manager and Quality Control Manager at the end of the shift.

There is a heightened risk of mistakes during flavor change overs. Besides the need to have verified cleaning and sanitation of equipment before running a new flavor, a sufficient break in the production run is recommended to ensure old packaging is removed and new packaging is in place. As above, confirm that the packaging reflects the ingredients to be used and obtain the same sign-offs. These sign-offs help ensure the process is followed.

One last step is to have your freezer personnel be the final check. They see what is coming into the freezer and can verify total packages/pallets. If they are aware of the total units planned for a production room, they are well-positioned to spot a variance. The key is having multiple, if not all, personnel involved at different steps to help prevent undeclared allergens.

As a final note, be aware of the higher-risk times of the day and year:

- Flavor change overs
- New people on the team
- Short staff days
- Holidays
- Busy times of year

This awareness and consistent diligence of your entire staff will prevent a tragedy. Take time to thank everyone in your company for their efforts. Nothing is more important than doing everything you can to make a safe product.